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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASVEEN SANGHA,
aka "the Ketamine Queen," and
SALVADOR PLASENCIA,
aka "Dr. P.,"

Defendants.

CR 24-236(A)-SPG

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE: 03/04/25
PROPOSED TRIAL DATE: 08/19/25
PROPOSED PTC DATE: 08/06/25

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of California and Assistant United States Attorneys Ian V. Yanniello and Haoxiaohan Cai, defendant Jasveen SANGHA ("defendant SANGHA"), both individually and by and through her counsel of record, Alexandra S. Kazarian and Mark Geragos, and defendant Salvador PLASENCIA

1 ("defendant PLASENCIA"), both individually and by and through his
2 counsel of record, Karen Goldstein and Debra White, (collectively,
3 the "parties"), hereby stipulate as follows:

4 1. The original indictment against defendant SANGHA was filed
5 on April 9, 2024. Defendant SANGHA first appeared before a judicial
6 officer of the court in which the charges in this case were pending
7 on March 21, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,
8 originally required the trial commence on or before June 18, 2024.

9 2. On May 2, 2024, the Court set a trial date of June 4, 2024
10 for defendant SANGHA and on May 23, 2024, the Court granted the first
11 request for a continuance, ordering that the trial be continued to
12 October 15, 2024.

13 3. On August 14, 2024, the First Superseding Indictment
14 ("FSI") was filed in this case. The FSI contained new charges
15 against defendant SANGHA and added defendant PLASENCIA as a
16 defendant. Defendant SANGHA appeared for her arraignment on the FSI
17 on August 15, 2024. Defendant PLASENCIA first appeared before a
18 judicial officer of the court in which the charges in this case were
19 pending on August 15, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,
20 originally required that the trial for Defendant PLASENCIA commence
21 before October 24, 2024. The Honorable Alka Sagar, United States
22 Magistrate Judge, set a trial date of October 8, 2024 for defendant
23 PLASENCIA,¹ and ordered a status conference for both defendants for
24 August 28, 2024, at 9:30 a.m.

25
26

27 ¹ At the initial appearance for defendant SANGHA, the court
28 acknowledged the October 15 trial for defendant SANGHA, but the
published minutes from the proceedings reflect an October 8, 2024
trial date. (Dkt. 41.)

1 4. Defendant SANGHA was ordered detained at the arraignment on
2 the FSI and detained pending trial. Defendant PLASENCIA is released
3 on bond. The parties estimate that the trial in this matter will last
4 approximately four to five days.

5 5. Both defendants are joined for trial and a severance has
6 not been granted.

7 6. The Court has previously continued the trial date twice for
8 defendant SANGHA in this case from June 4, 2024 to October 15, 2024,
9 and from October 15, 2024 to March 4, 2025 and found the interim
10 period to be excluded in computing the time within which the trial
11 must commence, pursuant to the Speedy Trial Act. The Court has
12 previously continued the trial date once for defendant PLASENCIA,
13 from October 8, 2024 to March 4, 2025. In granting the last
14 continuance, the Court also set a pretrial conference and hearing
15 schedule.

16 7. By this stipulation, the parties move to continue the joint
17 trial to August 19, 2025, and to continue the pretrial conference and
18 hearing schedule as follows: a pretrial conference on August 6, 2025
19 at 9:30 a.m., any pretrial motions to be filed by July 9, 2025, any
20 oppositions or responses to be filed by July 23, 2025, and any
21 replies to be filed by July 30, 2025.

22 8. Defendant SANGHA requests the continuance based upon the
23 following facts, which the parties believe demonstrate good cause to
24 support the appropriate findings under the Speedy Trial Act:

25 a. Defendant SANGHA is charged with five counts of
26 distribution of ketamine, including one count of distribution
27 resulting in death or serious bodily injury, in violation of 21
28 U.S.C. §§ 841(a)(1), (b)(1)(E)(i), one count of conspiracy to

1 distribute ketamine, in violation of 21 U.S.C. § 846, one count of
2 possession with intent to distribute ketamine, in violation of 21
3 U.S.C. §§ 841(a)(1), (b)(1)(E)(i), one count of possession with
4 intent to distribute methamphetamine, in violation of 21 U.S.C. §§
5 841(a)(1), (b)(1)(A)(viii), and one count of maintaining a drug
6 involved premises, in violation of 21 U.S.C. § 856. The government
7 has produced discovery to the defendant SANGHA, including hundreds of
8 pages of discovery that includes written reports, material related to
9 the execution of federal search warrants, laboratory analysis of
10 drugs found inside defendant's residence, expert disclosures, among
11 other material.

12 b. On May 13, 2024, defendant SANGHA's current counsel
13 substituted in as counsel of record. Defendant SANGHA's counsel
14 represents that counsel has the following conflicts described in
15 Exhibit A.

16 9. Defendant PLASENCIA requests the continuance based upon the
17 following facts, which the parties believe demonstrate good cause to
18 support the appropriate findings under the Speedy Trial Act:

19 a. Defendant PLASENCIA is charged with conspiracy to
20 distribute ketamine, in violation of 21 U.S.C. § 846, seven counts of
21 distribution of ketamine, in violation of 21 U.S.C. §§ 841(a)(1),
22 (b)(1)(E)(i), and two counts of altering and falsifying records
23 related to a federal investigation, in violation of 18 U.S.C. § 1519.
24 The government intends to produce discovery to defendant PLASENCIA
25 before the August 28 status conference, including materials relating
26 to the execution of federal search warrants, laboratory analysis of
27 drugs, victim information, interview reports and recordings, expert
28

1 reports, cellphone extractions and related reports, among other
2 materials.

3 b. On December 20, 2024, defendant PLASENCIA's current
4 counsel substituted in as counsel of record. Defendant PLASENCIA's
5 counsel represents that they have the following conflicts described
6 in Exhibit B.

7 c. In light of the foregoing, counsel for defendant
8 SANGHA and defendant PLASENCIA also represent that additional time is
9 necessary to confer with defendants, conduct and complete an
10 independent investigation of the case, conduct and complete
11 additional legal research including for potential pre-trial motions,
12 review the discovery and potential evidence in the case, and prepare
13 for trial in the event that a pretrial resolution does not occur.
14 Defense counsel represent that failure to grant the continuance would
15 deny them reasonable time necessary for effective preparation, taking
16 into account the exercise of due diligence.

17 d. Defendant SANGHA believes that failure to grant the
18 continuance will deny her continuity of counsel and adequate
19 representation.

20 e. Defendant PLASENCIA believes that failure to grant the
21 continuance will deny him continuity of counsel and adequate
22 representation.

23 f. The government does not object to the continuance.

24 g. The requested continuance is not based on congestion
25 of the Court's calendar, lack of diligent preparation on the part of
26 the attorney for the government or the defense, or failure on the
27 part of the attorney for the Government to obtain available
28 witnesses.

1 10. For purposes of computing the date under the Speedy Trial
2 Act by which defendant's trial must commence, the parties agree that
3 the time period from the date the stipulation is filed to March 4,
4 2025, inclusive, should be excluded pursuant to 18 U.S.C.
5 §§ 3161(h)(7)(A), (h)(7)(B)(i) and (h)(7)(B)(iv) because the delay
6 results from a continuance granted by the Court at defendant's
7 request, without government objection, on the basis of the Court's
8 finding that: (i) the ends of justice served by the continuance
9 outweigh the best interest of the public and defendant in a speedy
10 trial; (ii) failure to grant the continuance would be likely to make
11 a continuation of the proceeding impossible, or result in a
12 miscarriage of justice; and (iii) failure to grant the continuance
13 would unreasonably deny defendants continuity of counsel and would
14 deny defense counsel the reasonable time necessary for effective
15 preparation, taking into account the exercise of due diligence.

16 11. Nothing in this stipulation shall preclude a finding that
17 other provisions of the Speedy Trial Act dictate that additional time
18 periods be excluded from the period within which trial must commence.

19 //

Moreover, the same provisions and/or other provisions of the Speedy Trial Act may in the future authorize the exclusion of additional time periods from the period within which trial must commence.

IT IS SO STIPULATED.

Dated: February 4, 2025

Respectfully submitted,

JOSEPH T. MCNALLY
United States Attorney

LINDSEY G. DOTSON
Assistant United States Attorney
Chief, Criminal Division



IAN V. YANNIELLO
HAOXIAOHAN CAI
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

I am Jasveen SANGHA's attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of her Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than August 19, 2025 is an informed and voluntary one.

/s/ Alexandra Kazarian

ALEXANDRA S. KAZARIAN
MARK GERAGOS
Attorneys for Defendant
Jasveen SANGHA

January 31, 2025

Date

I have read this stipulation and have carefully discussed it with my attorney. I understand my Speedy Trial rights. I voluntarily

1 agree to the continuance of the trial date, and give up my right to
2 be brought to trial earlier than August 19, 2025.

3 
4 JASVEEN SANGHA
5 Defendant

1/31/25
Date

6
7 I am Salvador PLASENCIA's attorney. I have carefully discussed
8 every part of this stipulation and the continuance of the trial date
9 with my client. I have fully informed my client of his Speedy Trial
10 rights. To my knowledge, my client understands those rights and
11 agrees to waive them. I believe that my client's decision to give up
12 the right to be brought to trial earlier than August 19, 2025 is an
13 informed and voluntary one.

14
15 DEBRA WHITE
16 KAREN GOLDSTEIN
17 Attorneys for Defendant
18 Salvador PLASENCIA

Date

19 I have read this stipulation and have carefully discussed it
20 with my attorney. I understand my Speedy Trial rights. I voluntarily
21 agree to the continuance of the trial date, and give up my right to
22 be brought to trial earlier than August 19, 2025. I understand that I
23 will be ordered to appear in Courtroom 5C of the Federal Courthouse,
24 350 W. 1st Street, Los Angeles, California on August 6, 2025 at 9:30
25 a.m. and on August 19, 2025 at 8:30 a.m.

26
27 SALVADOR PLASENCIA
28 Defendant

Date

1 agree to the continuance of the trial date, and give up my right to
2 be brought to trial earlier than August 19, 2025.

3
4 JASVEEN SANGHA
Defendant

Date

5
6
7 I am Salvador PLASENCIA's attorney. I have carefully discussed
8 every part of this stipulation and the continuance of the trial date
9 with my client. I have fully informed my client of his Speedy Trial
10 rights. To my knowledge, my client understands those rights and
11 agrees to waive them. I believe that my client's decision to give up
12 the right to be brought to trial earlier than August 19, 2025 is an
13 informed and voluntary one.

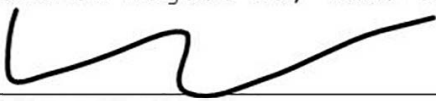
14 *Debra S. White*

1/29/2025

15 DEBRA WHITE
KAREN GOLDSTEIN
16 Attorneys for Defendant
Salvador PLASENCIA
17

Date

18
19 I have read this stipulation and have carefully discussed it
20 with my attorney. I understand my Speedy Trial rights. I voluntarily
21 agree to the continuance of the trial date, and give up my right to
22 be brought to trial earlier than August 19, 2025. I understand that I
23 will be ordered to appear in Courtroom 5C of the Federal Courthouse,
24 350 W. 1st Street, Los Angeles, California on August 6, 2025 at 9:30
25 a.m. and on August 19, 2025 at 8:30 a.m.

26 
27 SALVADOR PLASENCIA
Defendant

01/29/2025

Date

EXHIBIT A

PLASENCIA' s COUNSEL' S UPCOMING TRIAL SCHEDULE AND CONFLICTS

Debra White:

1) United States v. Daniel Messiah (CR 24-CR-00512-PA), false statements in a passport application, currently set for trial on March 4, 2025, expected to last 4 days. My client is facing up to 35 years in prison if convicted on all counts. The defense is in the process of preparing for trial. There are no trial continuances allowed. The parties are attempting to settle the case but have not reached an agreement to-date.

Karen Goldstein:

1) United States v. Cole, CR 24-409-PA, a child pornography production trial where the client is facing a mandatory minimum of 15 years and up to a life sentence The trial is estimated to be a 3-day trial, currently scheduled to start on April 8, 2025. There has been one request for a trial continuance and it was granted. Another continuance will not be granted. The case has been pending since July 2024. The parties will be ready for trial on the current date and this trial is likely to proceed to trial on this date. The trial is unlikely to settle.

2) United States v. Quintero, et al., (Arlene Quintero), CR 24-472-SVW-4, a complex, multi-defendant drug trafficking conspiracy case where the client is facing a mandatory minimum sentence of 10 years. The jury trial is estimated to be 10 days and is currently scheduled to start on September 26, 2025. The case has been pending since late July 2024. There has been one request for a trial continuance and it was granted. It is likely that another continuance will be granted and the trial will not proceed on that date. It is uncertain whether this case will settle. The parties, at least defense, is not yet ready for trial.

3) United States v. Buraye, et al., (Max Roman Betancourt) CR 24-0047-FMO-6, a complex, multi-defendant drug trafficking conspiracy case where where the client is facing a mandatory minimum sentence of 10 years. The jury trial is estimated to be 14 days and is currently scheduled for June 17, 2025. The case has been pending since March 2024. There has been one request for a trial continuance and it was granted. It is likely that another continuance will be granted and the trial will not proceed on that date. It is unknown whether this case will settle. The parties, at least defense, is not yet ready for trial.

EXHIBIT B

DEFENSE COUNSEL'S UPCOMING TRIAL SCHEDULE AND CONFLICTS

- (1) *People v. Marlo McGee*, Case No. RIF140673, Superior Court of California, Riverside County; Riverside Superior Court; Joshlyn Pulliam. The felony criminal complaint was filed on December 20, 2007, the defendant proceeded to trial, was convicted, and that matter was subsequently reversed and remanded on appeal in or about 2015. The charges involve murder pursuant to Penal Code Section 187, and are the result of the death of an infant and a prior conviction of a death of an infant in which the underlying cause of death will be litigated as a trial within the trial. The jury trial is currently set to begin on February 7, 2025. There have been approximately thirty-nine continuances of the trial date since the case was reversed and remanded due to the defendant's deteriorating health and severe sickle cell anemia. The estimated length of trial is six weeks.
- (2) *People v. Quinton Gardner*, Case No. BA500970, Superior Court of California, County of Los Angeles; Judge Karla Kerlin. The criminal complaint was filed on April 25, 2021. The defendant is charged with injuring a spouse pursuant to California Penal Code § 273.5(a)-F. This is not a complex matter. The trial in this case has been continued five times. Trial is scheduled to begin on March 13, 2025. The parties are ready to proceed. It is unlikely that a future continuance will be requested or granted.
- (3) *People v. Alex Janis Opmanis*, Case No. FSB19002771; Superior Court of California, County of San Bernardino; Judge William Jefferson Powell, IV. The felony criminal complaint was filed on or about August 13, 2019. Trial is set for March 24, 2025. The defendant is charged with murder pursuant to California Penal Code § 187. The trial in this case has been continued approximately twenty-six times, largely due to the complaint being filed pre-pandemic. Trial is estimated to last approximately two weeks. If counsel is not engaged, it is unlikely that a continuance will be requested or granted.
- (4) *United States of America v. Erik Salgado*, Case No. 5:24-cr-00201-JGB, United States District Court for the Central District of California; Judge Jesus G. Bernal. The felony criminal complaint was filed on August 14, 2024. The Defendant is charged with Deprivation of Rights Under Color of Law pursuant to 18 U.S.C. § 242. The trial in this case is currently scheduled for April 15, 2025. This matter has not had any trial continuances and the parties are not yet ready to proceed to trial. Defense counsel anticipates filing a request to continue trial.
- (5) *County of Los Angeles, et al. v. CROAG, Inc.*, Case No. 21STCV03275, Superior Court of California, County of Los Angeles; Judge Maureen Duffy-Lewis. This civil complaint was filed on January 27, 2021. This case pertains to alleged violations of the Los Angeles County Code and Public Health Orders, as well as a cross-complaint alleging civil rights violations by the County of Los Angeles. Trial is set for June 16, 2025 and is anticipated to last approximately two weeks. Trial in this matter has been continued approximately

three times. The parties are ready to proceed to trial and it is unlikely that any further continuances will be requested or granted.